

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**ANGEL ENRIQUE NUNEZ ESCOBAR,)
JESUS ANTONIO SANCHEZ VILLALOBOS,)
JORGE PALENCIA SARMIENTO, JOSE)
ARSENIO QUINTANILLA GOMEZ, JAVIER)
ORLANDO DERAS, JUAN BAUTISTA)
MENDEZ MARTINEZ, GERARDO MORTEO)
MENDEZ, ISIAS RAXCACO CAJBON,)
EDUARDO CAHUEC GARCIA, MARVIN)
BENJAMIN LOPEZ RAXICO, COSMER)
JUAREZ CAJBON, CARLOS ROBERTO)
MENDEZ MARTINEZ, DAVID SALGADO)
FIGUEROA, KIMBERLY CUSTIS, and)
SHANNON LORIEGA LUCAS, as parent and)
Next friend of her child, B.B., a minor)**

Plaintiffs,

v.

**LEE GAINES, Supervisory Detention and)
Deportation Officer, Immigration and Customs)
Enforcement (“ICE”) Nashville Fugitive)
Operations Team (“NVLFO”),)
CHRISTOPHER KOSHAR, ICE Nashville)
Homeland Security Investigations (“NVLHSI”))
Group Supervisor, ICE NVLFO Deportation)
Officers LEE C. WORSHAM, BRADLEY)
EPLEY, ERIC H. LIM, and BRIAN)
ABRAHAMSON, ICE NVLHSI Senior Special)
Agents PATRICK RYAN HUBBARD,)
JONATHAN ANDREW HENDRIX, and)
STEPHEN F. MCCORMICK, ICE NSVHSI)
Special Agents WAYNE DICKEY and)
CHRISTOPHER LANE, DANIEL HASTINGS,)
ICE Immigration Enforcement Agent, JANE)
DOE ICE AGENTS 1-2, JOHN DOE ICE)
AGENTS 1-13, GARY KEMPER, Sergeant,)
Metropolitan Nashville Police Department)
 (“MNP”) Gang Unit, SHAUN HARDIN,)
Detective, MNP Gang Unit, JANE ROE)
MNP OFFICERS 1-5, JOHN ROE MNP)
OFFICERS 1-5, GREYSTAR REAL ESTATE)**

**Civil No.: 3:11-cv-0994
Judge Campbell
Magistrate Judge Bryant**

**PARTNERS, LLC, TRITEX REAL ESTATE
ADVISORS, TRACY HALL, CRIME
SUPPRESSION SERVICES, and PAUL
WEST,**

Defendants.

MOTION FOR EXTENSION OF TIME TO ANSWER

The undersigned entered an appearance on the behalf of twelve agents or officers of the United States Immigration and Customs Enforcement Agency (Federal Defendants) on February 7, 2012. Until that time, the undersigned had no attorney-client relationship with these officers and agents who are sued individually in this cause.

Since February 7, 2012 the undersigned has had the opportunity to meet with these Federal Defendants for the purpose of formulating an Answer to the Complaint and to prepare a defense in this case.

Presently a draft Answer is being formulated on the behalf of the Federal Defendants which will be circulated to the Federal Defendants for review and revision.

To complete this process and fully Answer the 239 paragraphs of the Complaint as stated against these 12 Federal Defendants, and extension of time through and including March 13, 2012 is requested.

Respectfully submitted,

JERRY E. MARTIN
United States Attorney for the
Middle District of Tennessee

By: s/ S. Delk Kennedy, Jr.
S. DELK KENNEDY, JR.
Assistant United States Attorney
110 Ninth Avenue, South, Suite A-961
Nashville, Tennessee 37203
Telephone: 615-736-5151
B.P.R. #009799
Email: delk.kennedy@usdoj.gov

OF COUNSEL:
STEVE OHRVALL
Associate Legal Advisor
District Court Litigation Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
7701 N. Stemmons Frwy, 8th Floor
Dallas, TX 75247

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served via the Court's electronic filing system, this 22nd day of February 2012, upon:

Elliott Ozment
R. Andrew Free
Law Offices of Elliot Ozment
1214 Murfreesboro Pike
Nashville, TN 37217
Attorney for Plaintiffs

Richard C. Mangelsdorf, Jr.
Brian F. Walthart
Leitner, Williams, Dooley and Napolitan
414 Union Street, Suite 1900
Nashville, TN 37219
*Attorneys for Defendants, Greystar Real Estate Partners, LLC, Tritex
Real Estate Advisors, Inc. and Scott Jarvis*

s/ S. Delk Kennedy, Jr.
S. DELK KENNEDY, JR.
Assistant United States Attorney